IV. Environmental Impact Analysis

L. Public Services - Fire Protection

This section of the Draft EIR analyzes the proposed Project’s potential impacts on fire protection services as provided by the City of Los Angeles Fire Department (LAFD). The analysis addresses the proposed Project’s impacts relative to facilities and equipment, fire flows, emergency response, wildland fire hazards, and emergency access. Information for this section was provided, in part, by written correspondence from the LAFD, which is included in Appendix J of this Draft EIR.

1. Environmental Setting

Fire prevention, fire suppression, and life safety services in the City of Los Angeles are provided by the LAFD. The Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, as well as the Fire Code in the Los Angeles Municipal Code (LAMC) serve to guide City departments, government offices, developers and the public for the construction, maintenance and operation of fire protection facilities located within the City.

The LAFD has 3,586 uniformed personnel and 353 non-uniformed support staff.\(^1\) Services of the LAFD include fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education and community service. A professionally trained staff of 1,104 firefighters (including 242 paramedic-trained personnel) is on duty at all times at 106 neighborhood fire stations located across the LAFD’s 471 square-mile jurisdiction.\(^2\)

a. Existing Facilities

The Project Site is located within the LAFD’s Division 1, Battalion 5 which serves Hollywood, Los Feliz, and Griffith Park. Existing fire stations that currently serve the Project Site are listed in Table IV.L-1 on page IV.L-2 (see also Figure IV.L-1 on page IV.L-3)

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\(^2\) Ibid.
Table IV.L-1
Existing Fire Stations Serving the Project Site

<table>
<thead>
<tr>
<th>Station No.</th>
<th>Location</th>
<th>Equipment</th>
<th>Approx. Distance to Project Site (miles)</th>
</tr>
</thead>
</table>
| 76          | 3111 N. Cahuenga Blvd.| • Assessment Engine  
• Rescue Ambulance  | 2.8        |
| 86          | 4305 Vineland Ave.    | • Assessment Engine  
• Paramedic Ambulance  
• Urban Search and Rescue  
• Swift Water Rescue  
• Water Tender | 3.7        |
| 56          | 2759 Rowena Ave.      | • Assessment Engine  
• Paramedic Ambulance  
• Heavy Rescue | 7.0        |


for the locations of these fire stations). As shown in Table IV.L-1, the Project Site receives primary fire protection and paramedic service from LAFD Station No. 76 located at 3111 North Cahuenga Boulevard in the Cahuenga Pass, approximately 2.8 miles from the Project Site. Fire Station No. 76 is staffed with six LAFD staff members at all times. Four members are assigned to the Paramedic Assessment Fire Engine, two members are assigned to the Paramedic Rescue Ambulance, and one member is assigned as the Emergency Medical Service (EMS) Battalion Captain.

Additional fire protection and emergency medical services are provided by Fire Station Nos. 86 and 56. Station No. 86 is located at 4305 Vineland Avenue in Studio City, approximately 3.7 miles from the Project Site. Station No. 86 is staffed with seven members at all times. Four members are assigned to the Paramedic Assessment Fire Engine, two members are assigned to the Paramedic Rescue Ambulance, and one member is assigned as the EMS Battalion Captain. Station No. 56 is located at 2759 Rowena Avenue in Silver Lake, approximately 7.0 miles from the Project Site. Station No. 56 is staffed with eight members at all times. Four members are assigned to the Paramedic Assessment Fire Engine, two members are assigned to the Heavy Rescue unit, and two members are assigned to the Paramedic Rescue Ambulance. According to the LAFD, existing staffing and resources are currently adequate to meet the demand for fire and EMS services in the Hollywood Community Plan Area.
Figure IV.L-1
Fire Station Location Map

Legend

- 4305 Vineland Ave.
- 3111 N. Cahuenga Blvd.
- 2759 Rowena Ave.

Source: Thomas Brothers, Inc. CAJA, 2008.
Response distance relates directly to the linear travel distance (i.e., miles between a station and a site) and the LAFD's ability to successfully navigate the given accessways and adjunct circulation system. Roadway congestion and intersection level of service along the response route can affect the response distance when viewed in terms of travel time. The Fire Code specifies the maximum response distances recommended between specific sites and the nearest fire station, based on land use and fire flow requirements. Pursuant to Section 57.09.07A of the LAMC, the maximum response distance between residential land uses and an LAFD fire station that houses an engine or truck company is 1.5 miles; while for a commercial land use, the distance is 1.0 mile for an engine company and 1.5 miles for a truck company. When response distances exceed these recommendations, all habitable structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems).

As noted above, the closest LAFD fire station (No. 76) is approximately 2.8 miles from the Project Site. The LAFD has indicated that this response distance does not meet the Department's desired response distance standards.3

b. Fire Flows

In general, the quantity of water necessary for fire protection varies with the type of development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as building age or type of construction). Fire flow is normally measured in gallons per minute (gpm), as well as the duration of the fire flow. City-established fire flow requirements generally vary from 2,000 gpm in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any instance, a minimum residual water pressure of 20 pounds per square inch (PSI) is required to remain in the water system while the required gpm is flowing.

Water for fire flows for the area surrounding the Project Site is provided and maintained by the City of Los Angeles Department of Water and Power (LADWP). All water mains and lines that are designed and sized according to LADWP standards take into account fire flow and pressure requirements. There are two water mains located in Forest Lawn Drive; a low pressure, 24-inch water main that can supply approximately 5,000 gpm and a high-pressure, 8-inch water main that can supply 1,260 gpm fire flow and 400 gpm domestic flow.4 The static water pressure in the area is 122 PSI maximum and 5

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3 Written correspondence from Captain William Wells, Planning Section, LAFD, June 30, 2008.
4 Written correspondence from the City of Los Angeles Department of Water and Power, September 8, 2008.
PSI minimum based on a water meter elevation of 480 feet above sea level for the low-pressure domestic water system. The static water pressure for the high-pressure domestic water system is 283 PSI maximum and 209 PSI minimum based on a ground elevation of 517 feet above sea level. In addition, the LADWP is designing a potable water trunk line along Forest Lawn Drive to replace the existing line. This replacement is scheduled to be built and operational in late 2013 and will increase both the fire and domestic water flow and pressure. Refer to Section IV.K.2, Utilities - Water, of this Draft EIR for a more detailed discussion of water service infrastructure in the Project area.

c. Wildland Fire Hazards

The Project Site abuts hillside areas within Griffith Park and the Santa Monica Mountains to the east, south, and west. The Project Site itself is characterized with hillsides, terraced hills, and some generally flatter areas, and is located within a Very High Fire Hazard Severity Zone, as designated by the City of Los Angeles. As such, the Project Site is subject to brush clearance regulations enforced by the LAFD.

“Brush clearance” is a term that describes the process of treating or thinning vegetation to reduce fire hazards. The LAFD’s Brush Clearance Unit enforces the regulations contained in Section 57.21.07 of the Fire Code pertaining to brush clearance on improved parcels. The extent of brush clearance required depends in part on the distance of the brush from buildings or structures. “Structure” is defined by the Fire Code as “[t]hat which is built or constructed, an edifice or building of any kind, or any piece of work artificially built up or composed parts joined together in some definite manner.” LAMC, Chapter 5, Article 7, Section 57.02.02. The term “building” is not defined by the Fire Code.

Brush clearance requirements apply to any portion of property that is within 200 feet of any structure, even if the structure is not on the property. Area within 100 feet of a structure must be maintained to provide a “Defensible Space” where vegetation is less flammable and not excessive in volume. This “Defensible Space” allows firefighters to work around the structure while protecting it from fire. The area between 100 feet and 200 feet from structures is the “Fuel Modification Area.” Reduction of the volume of plant material lessens the likelihood that radiated heat would ignite the structure. In extreme wind-driven fires, flame lengths can reach well beyond 100 feet. Clearance is required within 10 feet of roadways (driveway, road, alley), within 10 feet of combustible fences, and within 200 feet of structures.

d. Emergency Access

Forest Lawn Drive provides direct access, including emergency access, to the Project Site. The main access into and out of the Project Site is located at Forest Lawn Drive and Memorial Drive. Emergency access is currently also provided by three subsidiary driveways, which are closed except for emergencies and maintenance activities: one west of the main entrance at Forest Lawn Drive near the western edge of the Project Site; one east of the main entrance at Forest Lawn Drive between Memorial Drive and Mount Sinai Drive; and one east of Mount Sinai Memorial Park.

2. Environmental Impacts

a. Thresholds of Significance

Appendix G of the CEQA Guidelines provides a screening question that addresses impacts with regard to fire protection service. This question is as follows:

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- Fire Protection?

In the context of this question from Appendix G of the CEQA Guidelines, the City of Los Angeles CEQA Thresholds Guide, states that a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service.

b. Project Impacts

The Project would continue and expand the existing cemetery use on the Project Site. Approximately 22,500 square feet of occupiable floor area for new structures (including such structures as a new reception facility, administrative space, and a crematory) would be constructed, as well as approximately 1,100,000 square feet of non-occupiable floor area (for such uses as burial garden structures, wall crypts and columbaria), and approximately 200,000 new interment sites. It is estimated that construction of the new structures would occur over an approximately 40-year period, from 2011 to 2050. The sale of interment sites would occur through year 2050 and beyond.
(1) Facilities and Equipment

Although the Project would increase the number of structures and interment sites within the Forest Lawn Memorial-Park - Hollywood Hills property, it is not anticipated to increase the level of interment activity or number of daily visitors at the Project Site. As noted in Section IV.J, Traffic, Circulation and Parking, of this Draft EIR, the average number of daily interments at the Forest Lawn Memorial-Park - Hollywood Hills property has been approximately the same for the last 13 years. Likewise, the death rate in Los Angeles County has remained relatively unchanged for many years. Therefore, the level of daily interment activity is expected to remain stable over the life of the Project, as it has been for the last 13 years. Even if the death rate in Los Angeles County were to increase, the average number of daily interments at the Memorial-Park would not substantially increase, due to existing logistical constraints at the facility. As such, the Project would not result in an increase for calls for fire protection services and would not necessitate the need for additional staffing or equipment. As discussed above, the LAFD has indicated that existing staffing and resources are currently adequate to meet the demand for fire and EMS services in the Hollywood Community Plan Area. For these reasons, with respect to equipment and personnel, the Project is not anticipated to adversely affect the demand for fire protection services at the Project Site to the extent that a new fire station or the expansion, consolidation or relocation of an existing facility would be required to maintain service. Accordingly, impacts would be less than significant, and mitigation is not required.

(2) Fire Flows

As discussed above and in Section IV.K.2, Utilities – Water, of this Draft EIR, domestic and fire water flow for the existing uses on the Project Site is provided via a low-pressure, 24-inch domestic water main located in Forest Lawn Drive. This main can supply approximately 5,000 gpm. There is also a high-pressure, 8-inch domestic water main in Forest Lawn Drive that can supply approximately 1,260 gpm fire flow and 400 gpm domestic flow. As an Interim Project, the Applicant is in the process of installing a new high pressure water service line and approximately 1,130 linear feet of pipe. This project was permitted in 2007 and is planned to be completed in early 2011. In addition, LADWP is currently in the process of upgrading the potable water trunk line beneath Forest Lawn Drive. This replacement is scheduled to be built and operational in late 2013 and will improve both the fire and domestic water flow and pressure. Together, these projects are anticipated to improve fire flow pressure on the Project Site.

As previously noted, City-established fire flow requirements generally vary from 2,000 gpm in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In addition, a minimum residual water pressure of 20 PSI is typically required to remain in the water system while the required gpm is flowing. As discussed above, the LADWP is designing a potable water trunk line along Forest Lawn Drive to
replace the existing line. This replacement is scheduled to be built and operational in late 2013 (prior to the construction of the majority of the Project’s improvements) and will also improve both the fire and domestic water flow and pressure.

Additionally, the specific fire flow requirement for the Project would be established by the LAFD during its review of building permits. The Water Operations Division of the LADWP would also perform a fire flow study at the time of permit review in order to ascertain whether further water system or site-specific improvements would be necessary. If existing water mains and/or existing hydrants along the Project frontage are determined to be inadequate at the time of Project development, the LAFD would require improvements as part of the Project permitting process. For these reasons, with respect to fire flow, the Project is not anticipated to adversely affect fire flow at the Project Site to the extent that a new fire station or the expansion, consolidation or relocation of an existing facility would be required to maintain service. Accordingly, impacts would be less than significant, and mitigation is not required.

(3) Emergency Response

As noted above, the Project Site is located outside the maximum response distance standard set forth in Section 57.09.07A of the LAMC. The LAFD has indicated that the response distance and response time to the Project Site from the nearest fire stations do not meet the LAFD’s desired response standards. Nonetheless, the LAFD has indicated that existing staffing and resources are considered adequate to meet the Project area’s proposed demand for fire and EMS services because the Project Site’s demand for fire protection services is unique for several reasons. For example, the Forest Lawn Memorial-Park - Hollywood Hills property is a low-density, low-intensity cemetery land use that employs relatively few employees as compared to other commercial, retail, or service uses of comparable size. In addition, the majority of the Memorial-Park’s active uses are located outdoors where there is no potential for structure fire. The Project Site would retain these characteristics with implementation of the Project. The majority of the structures proposed under the Project are non-occupiable structures for such uses as burial gardens, wall crypts and columbaria and are required to be constructed with non-flammable building materials such as concrete, masonry and stone. As shown in Figure II-10 in Section II, Project Description, of this Draft EIR, the Project’s proposed new occupiable floor area (including such structures as a new reception facility, administrative space, and a crematory) would be distributed throughout the 444-acre Project Site, thus reducing the potential for an on-site fire to spread from one structure to another. In addition, as noted in Section IV.J, Traffic, Circulation and Parking, of this Draft EIR, the Project would generate

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6 Written correspondence from Captain William Wells, Planning Section, LAFD, June 30, 2008.
negligible (if any) new traffic trips. As such, the Project would not impede emergency response to the Project Site by significantly impacting roadway intersections in the Project vicinity. Finally, all new occupiable flammable structures would be equipped with automatic fire sprinkler systems in accordance with LAMC Section 57.09.07. For these reasons, response distance and response time, while under LAFD standards, would not be anticipated to adversely affect emergency response to the Project Site to the extent that a new fire station or the expansion, consolidation or relocation of an existing facility would be required to maintain service. Accordingly, impacts would be less than significant, and mitigation is not required.

(4) Wildland Fire Hazards

As noted above, the Project Site is located within a Very High Fire Hazard Severity Zone, as designated by the City of Los Angeles, and as such, is subject to brush clearance regulations enforced by the LAFD's Brush Clearance Unit. As discussed above, the majority of the structures proposed under the Project (i.e., the non-occupiable floor area for such uses as burial garden structures, wall crypts and columbaria, which comprise approximately 90 percent of the proposed floor area) would be constructed with non-flammable building materials such as concrete, masonry, and stone. Nonetheless, the Project Applicant would be required to consult with the LAFD Brush Clearance Unit to establish site-specific brush clearance requirements at the time building permits are obtained, thereby ensuring that the Project would not create any undue fire hazard. Therefore, the Project would not be anticipated to adversely affect wildland fire hazards at the Project Site to the extent that a new fire station or the expansion, consolidation or relocation of an existing facility would be required to maintain service. Accordingly, impacts would be less than significant, and mitigation is not required.

(5) Emergency Access and LAFD Review

The Project proposes to expand the current facilities and develop currently undeveloped areas of the existing 444-acre Forest Lawn Memorial Park—Hollywood Hills property. The Project would not involve the permanent closure of any streets or sidewalks. The Project is not proposing to add new driveways on the streets bounding the Project Site and therefore would not impact site access. Additionally, the Project would not alter the overall internal circulation scheme within the Project Site. As noted above, emergency access is currently available from the main access as well as three subsidiary driveways; after completion of the Project, emergency access will be available from the main entrance as well as one subsidiary driveway. Access to the Project Site, including emergency access, would not change under the Project as compared to existing conditions. As noted in Section IV.J, Traffic, Circulation and Parking, of this Draft EIR, the Project is not expected to result in increased traffic, including at the primary site access location at Memorial Drive, and no off-site roadway improvements are proposed. In addition, during
the plan check process for each new structure, the Project Applicant will be required to submit the proposed plan to the LAFD for review for compliance with applicable Los Angeles Fire Code, California Fire Code, and City of Los Angeles Building Code. Any requirements identified during the review process would be implemented during Project development, thereby ensuring that the Project would not create any undue fire hazard. Therefore, the Project would not be anticipated to adversely affect emergency access to the Project Site to the extent that a new fire station or the expansion, consolidation or relocation of an existing facility would be required to maintain service. Accordingly, impacts would be less than significant, and mitigation is not required.

3. Cumulative Impacts

Implementation of the Project in combination with the related projects would increase the demand for fire protection services from fire stations that serve the Project Site. Specifically, there would be increased demands for additional LAFD staffing, equipment, and facilities by 2050. The LAFD has stated that existing staffing and resources are currently adequate to meet the demand for fire and EMS services in the Hollywood Community Plan Area, and that existing staffing and resources are considered adequate to meet the Project area’s proposed demand for fire and EMS services. Currently there are no plans to expand or replace existing fire stations, or construct new fire stations in the vicinity of the Project Site.

For any commercial related project more than one mile from an LAFD Engine Company, or 1.5 miles from an LAFD Truck Company, LAMC Section 57.09.07 requires the installation of automatic fire sprinkler systems in order to compensate for the additional response distance to combustible structures. Therefore, related projects may be required to install automatic fire sprinkler systems as each of the related projects would be required to consult with LAFD and LADWP during their design phase to establish fire flow requirements for the land uses proposed, and to determine adequacy of existing fire flow infrastructure serving their respective project sites. Any LAFD or LADWP-required upgrades to the water distribution systems serving the related projects would be addressed for each individual related project in conjunction with their project approvals. In addition, each of the related projects would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD and the City of Los Angeles to adequately mitigate fire protection impacts. If any of the related projects would create demands on fire protection staffing, equipment, or facilities such that a new station would be required, its potential environmental impacts would be addressed in conjunction with the environmental review for that project. Therefore, the proposed Project would not contribute a considerable incremental effect to cumulative fire protection impacts, and cumulative impacts to fire protection services would be less than significant.
4. **Mitigation Measures**

   As summarized in this Section, Project impacts to fire protection service would be less than significant. Accordingly, mitigation measures are not required.

5. **Level of Significance After Mitigation**

   Impacts related to fire protection services would be less than significant.